

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROBERT E. HERNREICH, AS TRUSTEE  
FOR THE ROBERT E. HERNREICH 2005  
TRUST, and SERURE SCOUT LLC,

Plaintiffs,

-against-

JAMES C. HECKMAN, JR., MARK  
STIEGLITZ, WILLIAM  
C. SORNSIN, JR., and ROSS LEVINSOHN,

Defendants.

**STIPULATION & PROPOSED  
ORDER OF DISMISSAL WITH  
PREJUDICE**

17 Civ. 6276 (GBD)

Pursuant to Rules 41(a)(1)(A)(ii) and 41(c) of the Federal Rules of Civil Procedure, all parties to the above-captioned action hereby stipulate and agree that the action in its entirety, including all claims against all Defendants, is dismissed with prejudice and without costs, disbursements, or attorneys' fees to any party.

Dated: March 23, 2018  
New York, New York

BERGER & MONTAGUE, P.C.

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*Attorneys for Defendants*

SO ORDERED:

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Hon. George B. Daniels  
UNITED STATES DISTRICT JUDGE

Dated: \_\_\_\_\_, 2018